

EXHIBIT A

STATE OF SOUTH CAROLINA) IN THE COURT OF COMMON PLEAS
COUNTY OF DORCHESTER) CASE NO.:
Mahly Desir,)
Plaintiff,)
vs.)
Darel Eugene Coen and Coen Equipment,)
Inc.,)
Defendants.)

)

TO THE ABOVE-NAMED DEFENDANTS:

YOU ARE HEREBY SUMMONED AND REQUIRED to answer the Complaint in this action, a copy of which is hereby served upon you, and to serve a copy of your Answer upon the subscriber at 1418 Park Street, Columbia, South Carolina, within thirty (30) days, thirty-five (35) days if service is by certified mail, exclusive of the day of said service, and if you fail to answer, appear or defend this action within the time aforesaid, judgment by default will be rendered against you for the relief demanded in the Complaint.

STANLEY LAW GROUP

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Columbia, South Carolina

Dated: December 13, 2021

STATE OF SOUTH CAROLINA)	IN THE COURT OF COMMON PLEAS
)	CASE NO.:
COUNTY OF DORCHESTER)	
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Mahly Desir,)	
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Darel Eugene Coen and Coen Equipment, Inc.,)	
)	
Defendants.)	
)	

The plaintiff, above named, complaining of the defendants, herein, would respectfully show:

1. That the plaintiff is a resident and citizen of the State of Texas.
2. That the defendant, Darel Eugene Coen, is a resident and citizen of the State of North Carolina.
3. That the defendant, Coen Equipment, Inc., is a corporation organized and existing under one of the states of the United States.
4. That at all times hereinafter mentioned, Interstate 95 is a paved public road running generally in a north/south direction and is located in the County of Dorchester, State of South Carolina.
5. That this court has jurisdiction of the parties and the subject matter herein as the motor vehicle crash at issue in this action occurred in Dorchester County, State of South Carolina.
6. That at all times hereinafter mentioned, the defendant, Coen Equipment, Inc., was the owner of a motor vehicle with Vehicle Identification Number 3C7WRLFL6FG531147, License Tag Number MN9718, State of North Carolina, that was operated by the defendant, Darel Eugene Coen, who was then and there driving and operating said motor vehicle as the servant and/or agent of the defendant, Coen Equipment, Inc., and in the actual or apparent course and scope of his employment with said defendant, and by reason thereof, defendant, Coen

- Equipment, Inc. is vicariously liable for the negligent acts of its said servant hereinafter complained of and for the injuries and damages sustained by plaintiff.
7. That on or about April 12, 2019, plaintiff, Mahly Desir, was a passenger of a motor vehicle that was traveling northbound on Interstate 95 in Dorchester County, South Carolina.
 8. That the defendant, Darel Eugene Coen, was the driver of a motor vehicle that was also traveling northbound on Interstate 95 in Dorchester County, South Carolina, one vehicle behind plaintiff's vehicle.
 9. That as plaintiff's motor vehicle came to a complete stop for traffic, the defendant, Darel Eugene Coen, failed to stop for traffic ahead and suddenly struck the rear of the vehicle behind plaintiff's vehicle with great force and violence. The force of the impact caused said vehicle to strike the rear of plaintiff's vehicle with great force and violence in a chain reaction of collisions.
 10. That as a direct and proximate result of the aforesaid collision, plaintiff suffered great physical harm and injury including past, present and future pain and suffering, medical expenses, mental anguish and impairment.
 11. That the defendant, Darel Eugene Coen, by and through his acts and omissions, was negligent, grossly negligent, careless, reckless, willful and wanton in one or more of the following particulars for which the defendant, Coen Equipment, Inc., is jointly and severally liable for to wit:
 - a. In failing to obey traffic laws pursuant to S.C. Code §56-05-1520;
 - b. In failing to keep his vehicle under proper control;
 - c. In failing to keep a proper lookout;
 - d. In driving too fast for conditions;
 - e. In driving at a fast and excessive rate of speed;
 - f. In following too close;
 - g. In failing to apply the brakes of his vehicle, if any he had;
 - h. In driving in a careless manner; and
 - i. In failing to use the degree of care and caution that a reasonable and prudent person would have used under the circumstances then and there prevailing.

All or one of which was the direct and proximate cause of the injuries and damages sustained by plaintiff, said acts being in violation of the statute laws of the State of South Carolina.

12. That due to the reckless, willful and wanton conduct of the defendant, as well as his violations of statutory law, plaintiff is specifically entitled to punitive damages.
13. That plaintiff, Mahly Desir, is informed and believes that she is entitled to judgment against the defendants, jointly and severally, for actual and punitive damages in an amount to be determined by the trier of fact.

WHEREFORE, plaintiff, Mahly Desir, prays for judgment against the defendants, jointly and severally, for actual and punitive damages in an amount to be determined by the trier of fact, for the cost of this action, and for such other and further relief as this court may deem just and proper.

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